

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1114013

Engineer: James Harader
Date: December 27, 2011

Facility Number: N-355
Facility Name: General Mills
Mailing Address: 2000 West Turner Road
Lodi, CA 95242

Contact Name: Wade Broughton
Phone: (209) 334-7090

Responsible Official: Jason Schierling
Title: Plant Manager

I. PROPOSAL

General Mills is proposing a Title V minor permit modification to incorporate Authority to Construct N-355-6-4 into the existing Title V operating permit. Authority to Construct N-355-6-4 authorizes the modification of a bulk sweetener receiving and storage operation, to rebuild the steam-heated flour dryer and to add a new dust collector to a surge bin that is located within the dryer. This project did not trigger a Major Modification.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

This facility is located at 2000 West Turner Road in Lodi, CA.

III. EQUIPMENT DESCRIPTION

N-355-6-6: BULK SWEETENER RECEIVING AND STORAGE OPERATION WITH ONE TRUCK RECEIVING PIT, TWO TRUCK/RAIL RECEIVING PITS, NINE FILTER RECEIVERS, 48 STORAGE SILOS, FLOUR DRYING SYSTEM, AND ASSOCIATED CONVEYING EQUIPMENT, ALL SERVED BY TWENTY-NINE BIN VENT FILTERS AND TEN BAGHOUSES

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

N-355-6-6

The following tables summarize the proposed modifications to the turbine permit.

Modified Conditions			
Previous TV PTO Condition #	ATC Condition #	New TV PTO Condition #	Proposed Changes to Conditions
None			

Removed Conditions	
Previous TV PTO Condition #	Proposed Changes to Conditions
None	

Added Conditions		
ATC Condition #	New TV PTO Condition #	Proposed Changes to Conditions
5	2	A condition was added to the permit that requires the operator to notify the District of any breakdown events.
6	3	A condition was added to the permit that requires material removed from the dust collector be disposed of in a manner that prevents entrainment into the atmosphere.
7	4	A condition was added to the permit that requires the dust cleaning frequencies and durations be optimized for control of emissions.
17	14	A condition was added that requires all records to be kept and maintained on site for five years, and be made available for District inspection upon request.

ATC Conditions that were not Added	
ATC Condition #	Proposed Changes to Conditions
1	This condition requires the facility to submit an application to modify the TV permit in accordance with the timeframes and procedures of District Rule 2520. This requirement has not been included on the new permit.
2 and 3	These conditions already appear on the facility-wide permit. Therefore, they have not been included on the new permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or Conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or Condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and Conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and

3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit
- B. Authority to Construct
- C. Title V Compliance Certification Form
- D. Previous Title V Operating Permit

ATTACHMENT A

Proposed Modified Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-355-6-6

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

BULK SWEETENER RECEIVING AND STORAGE OPERATION WITH ONE TRUCK RECEIVING PIT, TWO TRUCK/RAIL RECEIVING PITS, NINE FILTER RECEIVERS, 48 STORAGE SILOS, FLOUR DRYING SYSTEM, AND ASSOCIATED CONVEYING EQUIPMENT, ALL SERVED BY TWENTY-NINE BIN VENT FILTERS AND TEN BAGHOUSES

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown as amended December 17, 1992). [District Rule 1100] Federally Enforceable Through Title V Permit
3. Material removed from dust collection systems shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The dust collection systems cleaning frequencies and durations shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from each dust collector serving the bulk sweetener receiving and storage operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Visible emissions from baghouses that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Baghouse dust collection systems shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Baghouse dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. PM10 emissions from this operation shall not exceed 1.2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Sufficient records of production and emission factor data to verify compliance with the permitted emission limits shall be maintained on the premises and shall be updated daily. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
12. Records of baghouse dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.62}$ if P is greater than 30 tons per hour (amended December 17, 1992). [District Rule 4202] Federally Enforceable Through Title V Permit
14. All records shall be retained on-site for a period of five years and be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Authority to Construct



San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: N-355-6-4

ISSUANCE DATE: 06/15/2006

LEGAL OWNER OR OPERATOR: GENERAL MILLS OPERATIONS, INC

MAILING ADDRESS: ATTN: ACCOUNTS PAYABLE
PO BOX 1263
MINNEAPOLIS, MN 55440

LOCATION: 2000 W TURNER ROAD
LODI, CA 95240

EQUIPMENT DESCRIPTION:

MODIFICATION OF AN EXISTING BULK SWEETNER RECEIVING AND STORAGE OPERATION: TO REBUILD A STEAM-HEATED FLOUR DRYER AND ADD A NEW MAC EQUIPMENT MODEL 19RTC 3 SERIES II DUST COLLECTOR (BC-48) TO A SURGE BIN LOCATED WITHIN THE DRYER

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown as amended December 17, 1992). [District Rule 1100]
6. Material removed from dust collection systems shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
7. The dust collection systems cleaning frequencies and durations shall be adjusted to optimize the control efficiency. [District Rule 2201]
8. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services
N-355-6-4 - Jun 16 2006 9:22AM - KAHLOUJ - Joint Inspection Required with KAHLOUJ

9. Visible emissions from each dust collector serving the bulk sweetener receiving and storage operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Visible emissions from baghouses that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Baghouse dust collection systems shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Baghouse dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. PM₁₀ emissions from this operation shall not exceed 1.2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Sufficient records of production and emission factor data to verify compliance with the permitted emission limits shall be maintained on the premises and shall be updated daily. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. Records of baghouse dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.37 \times P^{0.62}$ if P is greater than 30 tons per hour (amended December 17, 1992). [District Rule 4202] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of five years and be made available for District inspection upon request. [District Rule 1070]

ATTACHMENT C

Title V Compliance Certification Form

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ SIGNIFICANT PERMIT MODIFICATION

☒ MINOR PERMIT MODIFICATION

☐ ADMINISTRATIVE

AMENDMENT

COMPANY NAME: General Mills Operations, Inc.	FACILITY ID: N - 355
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: General Mills Operations, Inc.	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):



Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).



Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.



Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.



Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

November 29, 2011

Date

Jason Schierling

Name of Responsible Official (please print)

Plant Manager

Title of Responsible Official (please print)

ATTACHMENT D

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-355-6-5

EXPIRATION DATE: 04/30/2016

EQUIPMENT DESCRIPTION:

BULK SWEETENER RECEIVING AND STORAGE OPERATION WITH ONE TRUCK RECEIVING PIT, TWO TRUCK/RAIL RECEIVING PITS, NINE FILTER RECEIVERS, 48 STORAGE SILOS, AND ASSOCIATED CONVEYING EQUIPMENT, ALL SERVED BY TWENTY-NINE BIN VENT FILTERS AND NINE BAGHOUSES

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Visible emissions from each dust collector serving the bulk sweetener receiving and storage operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Visible emissions from baghouses that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
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These terms and conditions are part of the Facility-wide Permit to Operate.